

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF QUEENS

Index No.:  
Date Purchased:

-----X  
ROGER RAMSAROOP,

Plaintiff,

-against-

UNITED AIRLINES, INC.,

Defendant.  
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**SUMMONS**

Plaintiff designates Queens  
County as the place of trial.

The basis of venue  
Plaintiff residence

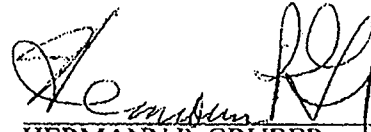
Plaintiff resides at:  
12 Muhlebach Court, Apt. #2  
Far Rockaway, NY 11691

County of Queens

**To the above named Defendant:**

**You are hereby summoned** to answer the complaint in this action, and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff's attorneys within twenty days after the service of this summons, exclusive of the day of service, where service is made by delivery upon you personally within the state, or, within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: Garden City, New York  
August 13, 2020

  
HERMANN P. GRUBER  
STEINBERG & GRUBER, P. C.  
Attorneys for Plaintiff  
300 Garden City Plaza, Suite 218  
Garden City, New York 11530  
(516) 663-0999

TO:

UNITED AIRLINES, INC.  
28 LIBERTY STREET  
NEW YORK, NY 10005

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF QUEENS-----X  
ROGER RAMSAROOP,

Plaintiff,

Index No.:  
Date Purchased:**VERIFIED COMPLAINT**

-against-

UNITED AIRLINES, INC.,

Defendant.  
-----X

Plaintiff, **ROGER RAMSAROOP**, by her attorneys, **STEINBERG & GRUBER, P. C.**, complaining of the Defendant, **UNITED AIRLINES, INC.**, respectfully alleges, upon information and belief:

1. That at the time of the commencement of this action, Plaintiff, **ROGER RAMSAROOP** resided in the County of Queens, State of New York.
2. Upon information and belief, at all times hereinafter mentioned the defendant, **UNITED AIRLINES, INC.**, was and still is a Delaware business corporation, licensed to do business in the State of New York, and existing under and by virtue of the laws of the State of New York, with principal offices located in the County of Queens, City and State of New York.
3. Upon information and belief, defendant was the owner of the premises known and designated as United Airlines Cargo terminal at building 344, front lobby, at Newark Liberty International Airport, County of Essex, City of Newark and State of New Jersey.
4. Upon information and belief, at all times hereinafter mentioned, the defendant was and still is the lessee of the premises known and designated as United Airlines Cargo terminal at building 344, front lobby, at Newark Liberty International Airport, 3 Bewster Road, Newark, New Jersey 07114.
5. Upon information and belief at all times hereinafter mentioned, the defendant, operated, maintained, managed, supervised, repaired and controlled the premises including the automatic front doors thereat, known as United Airlines Cargo terminal at building 344, front lobby, at Newark Liberty International Airport, 3 Bewster Road, Newark, New Jersey 07114.

6. Upon information and belief at all times hereinafter mentioned, the defendant, was under a duty to operate, manage, maintain, control, repair and supervise the aforesaid premises including the automatic front doors thereat, in a safe, proper and lawful fashion, such that no person lawfully therein would be caused to sustain personal injuries.

7. At all times hereinafter mentioned, the aforesaid premises were open for use to the general public and patrons of United Airlines Inc.

8. That on June 19, 2018, Plaintiff, **ROGER RAMSAROOP** was a lawful pedestrian on the premises of the above-mentioned location.

9. That on June 19, 2018, while the plaintiff, **ROGER RAMSAROOP**, was lawfully upon the aforesaid premises, and in particular, at the front lobby automatic/electronic doors therein, when he was caused to fall due to the automatic/electronic doors closing on him and was violently propelled to the ground, due to the negligence of the defendant.

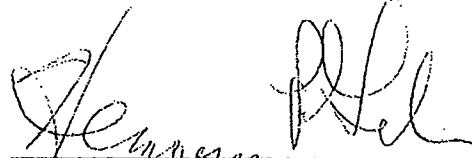
10. That no negligence on the part of the Plaintiff contributed to the occurrence alleged herein in any manner whatsoever.

11. That because of the above stated premises and sidewalk in front of same, Plaintiff, **ROGER RAMSAROOP** was caused to sustain serious injuries and to have suffered pain, shock and mental anguish; that these injuries and their effects will be permanent; and as a result of said injuries, Plaintiff has been caused to incur, and will continue to incur, expenses for medical care and attention; and, as a further result, Plaintiff was, and will continue to be, rendered unable to perform Plaintiff's normal activities and duties and has sustained a resultant loss therefrom.

12. That by reason of the foregoing, Plaintiff, **ROGER RAMSAROOP** was damaged in a sum which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

WHEREFORE, plaintiff demands judgment against the defendant herein in a sum that exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction of this action, together with costs and disbursements of this action and interest thereon; and such other and further relief that the court deems just and proper.

Dated: Garden City, New York  
August 13, 2020



STEINBERG & GRUBER, P.C.

By: Hermann P. Gruber, Esq.

Attorneys for Plaintiff

ROGER RAMSAROOP

300 Garden City Plaza, Suite 218

Garden City, New York 11530

(516) 663-0999

TO:

UNITED AIRLINES, INC.  
28 LIBERTY STREET  
NEW YORK, NY 10005

**ATTORNEY'S VERIFICATION**

**HERMANN P. GRUBER**, an attorney duly admitted to practice before the Courts of the State of New York, affirms the following to be true under the penalties of perjury:

I am an attorney at **STEINBERG & GRUBER, P. C.**, attorneys of record for Plaintiff, **ROGER RAMSAROOP**. I have read the annexed **COMPLAINT** and know the contents thereof, and the same are true to my knowledge, except those matters therein which are stated to be alleged upon information and belief, and as to those matters I believe them to be true. My belief, as to those matters therein not stated upon knowledge, is based upon facts, records, and other pertinent information contained in my files.

This verification is made by me because Plaintiff is not presently in the county wherein I maintain my offices.

Dated: Garden City, New York  
August 13, 2020



HERMANN P. GRUBER